

Steve W. Berman (Pro Hac Vice)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com

Bruce L. Simon (96241)  
PEARSON SIMON WARSHAW & PENNY, LLP  
44 Montgomery Street, Suite 1200  
San Francisco, CA 94104  
Telephone: (415) 433-9000  
Facsimile: (415) 433-9008  
bsimon@pswplaw.com

*Plaintiffs' Interim Co-Lead Counsel*

*[Additional Counsel listed on  
Signature Page]*

RODGER R. COLE (CSB No. 178865)  
[rcole@fenwick.com](mailto:rcole@fenwick.com)  
MOLLY R. MELCHER  
(CSB No. 272950)  
[mmelcher@fenwick.com](mailto:mmelcher@fenwick.com)  
FENWICK & WEST LLP  
Silicon Valley Center  
801 California Street  
Mountain View, CA 94041  
Telephone: 650.988.8500  
Facsimile: 650.938.5200

TYLER G. NEWBY (CSB No. 205790)  
[tnewby@fenwick.com](mailto:tnewby@fenwick.com)  
JENNIFER J. JOHNSON  
(CSB No. 252897)  
[jjjohnson@fenwick.com](mailto:jjjohnson@fenwick.com)  
FENWICK & WEST LLP  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104  
Telephone: 415.875.2300  
Facsimile: 415.281.1350

*Attorneys for Defendant  
Carrier IQ, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

*In re Carrier IQ, Inc. Consumer Privacy  
Litigation*

[This Document Relates to All Cases]

Case No. C-12-md-2330-EMC

**STIPULATION AND [PROPOSED]  
ORDER FOR CONTINUANCE OF  
TIME FOR PLAINTIFFS TO FILE A  
STIPULATION REGARDING ENTRY  
OF A PROTECTIVE ORDER**

**STIPULATION**

This Stipulation and [Proposed] Order is entered into by and between Plaintiffs' Interim Co-Lead Counsel and Defendants' counsel (collectively, the "Parties") as follows:

WHEREAS, pursuant to the Civil Minutes issued by this Court on May 24, 2012, Plaintiffs' deadline to file a stipulation regarding the entry of a protective order is 30 days after

1 the appointment of lead counsel (Dkt. No. 59);

2 WHEREAS, on July 12, 2012, this Court appointed Plaintiffs' interim co-lead counsel  
3 (Dkt. No. 99);

4 WHEREAS, the deadline for Plaintiffs to file a stipulation regarding the entry of a  
5 protective order is August 13, 2012;

6 WHEREAS, the Parties have conferred and agreed that the deadline for Plaintiffs to file a  
7 stipulation regarding the entry of a protective order shall be continued until 14 days after the  
8 filing of the consolidated, amended complaint on August 27, 2012, at which time it will be  
9 apparent which defendants have been named in the consolidated, amended complaint;

10 NOW THEREFORE, the Parties, by and through their respective counsel of record,  
11 hereby stipulate, subject to Court approval, as follows:

12 The deadline for Plaintiffs to file a stipulation regarding the entry of a protective order  
13 currently set for August 13, 2012 is continued to September 10, 2012.

14 IT IS SO STIPULATED.

15 Dated: August 10, 2012

By: /s/ Robert F. Lopez

STEVE W. BERMAN  
HAGENS BERMAN SOBOL SHAPIRO LLP  
Robert F. Lopez (Pro Hac Vice)  
Thomas E. Loeser (202724)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
robl@hbsslaw.com  
[toml@hbsslaw.com](mailto:toml@hbsslaw.com)

Jeff D. Friedman (173886)  
Shana E. Scarlett (217895)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
jefff@hbsslaw.com  
shanas@hbsslaw.com

1 By: /s/ Daniel L. Warshaw  
 2 Daniel L. Warshaw (185365)  
 3 PEARSON SIMON WARSHAW & PENNY,  
 4 LLP  
 5 15165 Ventura Blvd., Suite 400  
 6 Sherman Oaks, CA 91403  
 7 Telephone: (818) 788-8300  
 8 Facsimile: (818) 788-8104  
 9 [dwarshaw@pswplaw.com](mailto:dwarshaw@pswplaw.com)

10 BRUCE L. SIMON  
 11 44 Montgomery Street, Suite 1200  
 12 PEARSON SIMON WARSHAW & PENNY,  
 13 LLP  
 14 San Francisco, CA 94104  
 15 Telephone: (415) 433-9000  
 16 Facsimile: (415) 433-9008  
 17 [bsimon@pswplaw.com](mailto:bsimon@pswplaw.com)

18 *Plaintiffs' Interim Co-Lead Counsel*

19 By: /s/ Tyler G. Newby  
 20 Tyler G. Newby (CSB No. 205790)  
 21 [tnewby@fenwick.com](mailto:tnewby@fenwick.com)  
 22 Jennifer J. Johnson (CSB No. 252897)  
 23 [jjjohnson@fenwick.com](mailto:jjjohnson@fenwick.com)  
 24 FENWICK & WEST LLP  
 25 555 California Street, 12th Floor  
 26 San Francisco, CA 94104  
 27 Ph: (415) 875-2300  
 28 Fax: (415) 281-1350

Rodger R. Cole (CSB No. 178865)  
[rcole@fenwick.com](mailto:rcole@fenwick.com)  
 Molly R. Melcher (CSB No. 272950)  
[mmelcher@fenwick.com](mailto:mmelcher@fenwick.com)  
 FENWICK & WEST LLP  
 801 California Street  
 Mountain View, CA 94041  
 Ph: (650) 988-8500  
 Fax: (650) 938-5200

*Attorneys for Defendant Carrier IQ, Inc.*

25 By: /s/ Gail E. Lees  
 26 Gail E. Lees  
 27 [grees@gibsondunn.com](mailto:grees@gibsondunn.com)  
 28 S. Ashlie Beringer  
[aberinger@gibsondunn.com](mailto:aberinger@gibsondunn.com)  
 Joshua A. Jessen

[jjessen@gibsondunn.com](mailto:jjessen@gibsondunn.com)  
GIBSON, DUNN & CRUTCHER LLP  
1881 Page Mill Road  
Palo Alto, CA 94304  
Phone: (650) 849-5300  
Fax: (650) 849-5333

*Attorneys for Defendant Apple Inc.*

By: /s/ Christopher J. Kelly  
Christopher J. Kelly (SBN 276312)  
[cjkelly@mayerbrown.com](mailto:cjkelly@mayerbrown.com)  
MAYER BROWN LLP  
Two Palo Alto Square, Suite 300  
3000 El Camino Real  
Palo Alto, CA 94306-2112  
Phone: (650) 331-2000  
Fax: (650) 331-2060

Evan M. Tager  
[etager@mayerbrown.com](mailto:etager@mayerbrown.com)  
Archis Parasharami  
[aparasharami@mayerbrown.com](mailto:aparasharami@mayerbrown.com)  
Andrew A. Nicely  
MAYER BROWN LLP  
1999 K Street N.W.  
Washington, D.C. 20006  
Phone: (202) 263-3000  
Fax: (202) 263-3300

*Attorneys for Defendant AT&T Mobility LLC*

By: /s/ Rosemarie T. Ring  
Rosemarie T. Ring (SBN 220769)  
[Rose.Ring@mto.com](mailto:Rose.Ring@mto.com)  
Jonathan H. Blavin (SBN 230269)  
[Jonathan.Blavin@mto.com](mailto:Jonathan.Blavin@mto.com)  
Bryan H. Heckenlively (SBN 279140)  
[Bryan.Heckenlively@mto.com](mailto:Bryan.Heckenlively@mto.com)  
MUNGER, TOLLES & OLSON, LLP  
560 Mission Street  
Twenty-Seventh Floor  
San Francisco, CA 94105-2907  
Phone: (415) 512-4000  
Fax: (415) 512-4077

Henry Weissmann (SBN 132418)  
[Henry.Weissmann@mto.com](mailto:Henry.Weissmann@mto.com)  
MUNGER, TOLLES & OLSON, LLP  
355 South Grand Avenue,  
Thirty-Fifth Floor  
Los Angeles, CA 90071-1560

Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

*Attorneys for Defendant HTC America, Inc.*

By: /s/ Simon J. Frankel

Simon J. Frankel  
[sfrankel@cov.com](mailto:sfrankel@cov.com)  
Mali B. Friedman  
[mfriedman@cov.com](mailto:mfriedman@cov.com)  
COVINGTON & BURLING LLP  
1 Front St., 35th Floor  
San Francisco, CA 94111  
Phone: (415) 591-6000  
Fax: (415) 591-6091

*Attorneys for Defendant Huawei Devices USA, Inc.*

By: /s/ James Donato

James Donato (SBN (146140)  
[jdonato@shearman.com](mailto:jdonato@shearman.com)  
SHEARMAN & STERLING LLP  
Four Embarcadero Center, Suite 3800  
San Francisco, CA 94111-5994  
Phone: (415) 616-1100  
Fax: (415) 616-1199

*Attorneys for Defendants LG Electronics U.S.A., Inc., LG Electronics MobileComm U.S.A., Inc. LG Electronics Mobile Research U.S.A., LLC*

By: /s/ Norman K. Beck

Peter C. McCabe III  
[pmccabe@winston.com](mailto:pmccabe@winston.com)  
Norman K. Beck  
[nbeck@winston.com](mailto:nbeck@winston.com)  
Scott T. Sakiyama  
[ssakiyama@winston.com](mailto:ssakiyama@winston.com)  
WINSTON & STRAWN LLP  
35 W. Wacker Drive  
Chicago, IL 60601-9703  
Phone: (312) 558-5600  
Fax: (312) 558-5700

Richard A. Lapping (SBN: 107496)  
[rlapping@winston.com](mailto:rlapping@winston.com)  
WINSTON & STRAWN LLP  
101 California Street  
San Francisco, CA 94111-5894  
Telephone: (415) 591-1000

Facsimile: (415) 591-1400

*Attorneys for Defendant Motorola Mobility LLC*

By: /s/ Wayne M. Helge

Wayne M. Helge  
8500 Leesburg Pike, Suite 7500  
Vienna, VA 22182  
Phone: (703) 288-5105  
Fax: (703) 288-5139

*Attorneys for Defendant Pantech Wireless, Inc.*

By: /s/ Lance A. Etcheverry

Lance A. Etcheverry  
[lance.etcheverry@skadden.com](mailto:lance.etcheverry@skadden.com)  
300 South Grand Avenue, Suite 3400  
Los Angeles, California 90071  
Phone: (213) 687-5000  
Fax: (213) 687-5600

*Attorneys for Defendants Samsung Electronics  
America, Inc. and Samsung Telecommunications  
America, LLC*

By: /s/ Timothy L. Alger

Timothy L. Alger (CSB 160303)  
[talger@perkinscoie.com](mailto:talger@perkinscoie.com)  
PERKINS COIE LLP  
3150 Porter Drive  
Palo Alto, CA 94304  
Phone: (650) 838-4300  
Fax: (650) 838-4350

Amanda J. Beane (WA 33070)  
[abeane@perkinscoie.com](mailto:abeane@perkinscoie.com)  
PERKINS COIE LLP  
1201 Third Avenue, Suite 4800  
Seattle, WA 98101-3099  
Phone: (206) 359-3965  
Fax: (206) 359-4965

*Attorneys for Defendant Sprint Spectrum L.P.  
(also erroneously sued as Sprint Nextel Corp.)  
and Sprint Solutions, Inc.*

**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Molly R. Melcher, am the ECF User whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF TIME FOR PLAINTIFFS TO FILE A STIPULATION REGARDING ENTRY OF A PROTECTIVE ORDER**. In compliance with General Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

Dated: August 10, 2012

/s/ Molly R. Melcher

Molly R. Melcher

**~~[PROPOSED]~~ ORDER**

Pursuant to stipulation, it is SO ORDERED.

Dated: August 14, 2012

Honorable Edward M. Chen  
United States District Court

